

**REMARKS**

Applicants respectfully request reconsideration based on the above amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

In the claim amendments, claims 1 and 8 have been amended, and claims 5-7, 11 and 16-36 have been canceled without prejudice. Support for the amendment can be found in the entire specification. Figs. 1B of the application, for example, shows that the IZO layer (76) contacts the lower film (72p) and the upper surface of the upper film (72q). No new matter has been added by the amendments.

***Drawing Objections***

Figure 1A stands objected because the line of "IA-IA" mentioned in the specification is not found therein. The specification, for example, the paragraphs beginning at page 6, line 7 and page 8, line 29 have been amended to correct the word "IA-IA" into the word "IB-IB", which is indicated in Figure 1A. Thus, it is believed that all features mentioned in the specification are shown in the drawings.

Withdrawal of the drawing objections is respectfully requested.

***Claim Rejections Under 35 U.S.C. §103***

Claims 1-4 and 8-15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kim (US 2001/0019126) in view of Lee (US 2002/0041347) for the reasons stated on pages 2-4 of the Office Action. Applicants respectfully traverse the rejection as followings.

For an obviousness rejection to be proper, the Examiner must meet the burden of establishing that all elements of the invention are disclosed in the prior art; that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references; and that the proposed modification of the prior art must have had a reasonable expectation of success, determined from the vantage point of the skilled artisan at the time the invention was made. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d, 1016,

1023 (Fed. Cir. 1996). Neither Kim nor Lee teaches or suggests all elements of the claimed invention for the reasons stated as follows.

Claim 1 recites a contact structure of a semiconductor device, the contact structure comprising: a dry-etchable lower conductive film; an upper conductive film formed on the lower film and including Al or Al alloy, the upper film having edges located on the lower film; an insulator having a contact hole exposing at least a portion of the lower film; and an IZO layer formed on the insulator and contacting the lower film and an upper surface of the upper film through the contact hole. In claim 1, the IZO layer contacts both the lower film and the upper surface of the upper film. Fig. 1B of the Application, for example, teaches that the IZO layer (76) contacts the upper surface of the upper film (72q) as well as the lower film (72p). Therefore, the connection between the IZO layer and the wire can be improved in the claimed invention.

In contrary, Fig. 14 and paragraph [0030] of Kim teach that the transparent conductive-layer (44) is disposed on the entire surface of the structure of Fig. 13, in which the insulation layer (34) is disposed on the upper surface of the layer (32) of an aluminum alloy, and into the contact holes. Therefore, it is the insulation layer (34) that contacts the upper surface of the layer (32) of the aluminum alloy. Thus, Kim neither teaches nor suggests the feature “an IZO layer formed on the insulator and contacting the lower film and an upper surface of the upper film through the contact hole”, as recited in claim 1. The deficiency of Kim is not cured by Lee, because Lee neither teaches nor suggests the feature “an IZO layer formed on the insulator and contacting the lower film and an upper surface of the upper film through the contact hole”, as recited in claim 1. Accordingly, the combination of Kim and Lee does not render claim 1 obvious because none of them teaches or suggests the feature “an IZO layer formed on the insulator and contacting the lower film and an upper surface of the upper film through the contact hole”, as recited in claim 1.

Since it contains similar features, claim 8 is believed to allowable for at least the reasons given for claim 1. Claims 2-4 depend from claim 1, and claims 9-10 and 12-15 depend from claim 8. These dependent claims are believed to be allowable due to their dependency on claims 1 and 8.

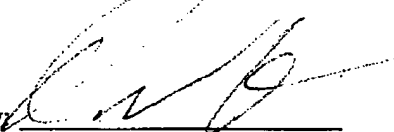
**Conclusion**

In view of the foregoing, it is respectfully submitted that the instant application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicants' attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

CANTOR COLBURN LLP

By 

David A. Fox

Registration No.: 38,807

Confirmation No. 3225

Cantor Colburn LLP

55 Griffin Road South

Bloomfield, CT 06002

PTO Customer No. 23413

Telephone: (860) 286-2929

Facsimile: (860) 286-0115

Date: January 31, 2005